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ATTORNEYS FOR DANBURY PARTNERS, LTD.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE:	§	
	§	
SPORTS ONE SUPERSTORES CORP.	§	CASE NO. 22-30085-sgj
And	§	
TEXAS HOLDINGS FIRM CORP.	§	CHAPTER 11
	§	
	§	
Debtors	§	Jointly Administered

**EMERGENCY MOTION OF DANBURY PARTNERS, LTD. TO MODIFY
AUTOMATIC STAY AND FURTHER RELIEF PURSUANT TO ORDER ENTERED
MAY 3, 2022**

PURSUANT TO LOCAL BANKRUPTCY RULE 4001-1(b), A RESPONSE IS REQUIRED
TO THIS MOTION, OR THE ALLEGATIONS IN THE MOTION MAY BE DEEMED
ADMITTED, AND AN ORDER GRANTING THE RELIEF SOUGHT MAY BE ENTERED
BY DEFAULT.

ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK OF THE
UNITED STATES BANKRUPTCY COURT AT 1100 Commerce, Room 1254, Dallas, Texas
75242-1496 BEFORE CLOSE OF BUSINESS ON May 19, 2022, WHICH IS AT LEAST 14
DAYS FROM THE DATE OF SERVICE HEREOF.

A COPY SHALL BE SERVED UPON COUNSEL FOR THE MOVING PARTY AND ANY
TRUSTEE OR EXAMINER APPOINTED IN THE CASE. ANY RESPONSE SHALL
INCLUDE A DETAILED AND COMPREHENSIVE STATEMENT AS TO HOW THE
MOVANT CAN BE “ADEQUATELY PROTECTED” IF THE STAY IS TO BE CONTINUED.

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Danbury Partners, Ltd. (“Danbury”) and files this Emergency Motion and

would show as follows:

1. On May 3, 2022 this Court entered its *Order Following Hearings On May 2, 2022* (the "Order"). [Doc. 65]. The Order provided that the Debtors had until 5:00 p.m. on May 4, 2022 to make a rental payment and to provide Danbury with proof of continued insurance. Debtors have not made any rental payments nor provided proof of insurance.
2. The Order further provided that if the debtors defaulted Danbury could file a motion for emergency relief.
3. In accordance with the Order, Danbury requests this Court to modify the automatic stay to permit Danbury to take all appropriate steps pursuant to Texas law to gain possession of the leased premises at 934 E. Copeland Road, Suite 100, Arlington, Texas (the "Leased Premises"). Such steps would include, but not be limited to, issuing notices of default and filing and prosecuting state-law eviction proceedings.
4. The Leased Premises are not needed for an effective reorganization as the evidence in prior proceedings shows that there will be no reorganization of these Debtors.
5. Modification of the automatic stay will not materially affect the substantive rights of any other creditors while still protecting the rights of Danbury.
6. Alternatively, Danbury further requests such orders as are necessary to protect its interests pursuant to the Order.

WHEREFORE, PREMISES CONSIDERED, Danbury Partners, Ltd. prays that this Court modify the automatic stay as requested above and for such other and further relief to which Danbury may show itself justly entitled.

Respectfully submitted.

/s/ Robert M. Nicoud, Jr.

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ATTORNEYS FOR DANBURY PARTNERS,
LTD.

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of May 2022, a true and correct copy of the foregoing document was sent via electronic means or by first class mail, postage prepaid to the persons shown below:

Brandon J. Tittle
TITTLE LAW GROUP, PLLC
5550 Granite Pkwy, Suite 220
Plano, Texas 75024

Asher Bublick, Trial Attorney
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1100 Commerce Street, Room 976
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Sports One Superstores Corp.
Texas Holdings Firm Corporation
c/o Enoch Kirkwood, President and CEO
Emails: enoch@SportsOneSuperstores.com; management@cmaholdingsllc.com;
texasholdingsfirm@gmail.com.

All parties receiving notice via ECF

/s/ Robert M. Nicoud, Jr.

Robert M. Nicoud, Jr.